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April 24, 2018

Via ECF

The Honorable Leo T. Sorokin
John Joseph Moakley Courthouse
1 Courthouse Way
Boston, MA 02210

Re: USA v. McLellan et al
1:16-cr-10094-LTS

Dear Judge Sorokin:

As a follow-up to today's hearing on the pending motion to continue, we write to address the government's contention that a continuance would lead to a trial date in 2019. Respectfully, we do not believe that a continuance of this case necessitates a date in 2019. Instead, to the extent the Court is inclined to grant the motion to continue, the defense believes trial could begin shortly after September 4, 2018, a date that does not conflict with Mr. Frank's August vacation schedule and which would also provide Mr. Johnston sufficient time before his October 29, 2018, trial in the District of Nevada.

We thank you in advance for your attention to this matter.

Yours Truly,

/s/ Robert M. Goldstein
Robert M. Goldstein

/s/ Martin G. Weinberg
Martin G. Weinberg

Counsel for Defendant Ross McLellan